

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

REGINALD HOYLE,

Plaintiff,

v.

JERRY R. MITCHELL, JR. D/B/A
JR'S TOWING & RECOVERY,

Defendant.

CIVIL ACTION FILE
NUMBER: 1:22-cv-00488-SEG

**DEFENDANT JERRY R. MITCHELL, JR. D/B/A JR.'S TOWING & RECOVERY'S
SUPPLEMENTAL INITIAL DISCLOSURES**

(6) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703 or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Initial Disclosures as Attachment B.)

See supplemental response to Attachment B.

DENNIS, CORRY, SMITH & DIXON, LLP

/s/ *Grant B. Smith*

GRANT B. SMITH, ESQ.

Georgia bar number 658345

/s/ *M. Angela Cooper*

M. ANGELA COOPER, ESQ.

Georgia bar number 186164

For the Firm

Attorneys for Defendant

900 Circle 75 Parkway, Suite 1400

Atlanta, GA 30339

(404) 926-3659

(404) 365-0134 Facsimile

Gbs@dcplaw.com

Acooper@dcplaw.com

CERTIFICATE OF SERVICE

I electronically filed this **DEFENDANT JERRY R. MITCHELL, JR. D/B/A JR.'S TOWING & RECOVERY'S SUPPLEMENTAL INITIAL DISCLOSURES** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Blake Fluevog, Esq.
178 S. Main Street
Unit 300
Alpharetta, GA 30009

Christopher Whitlock, Esq.
McAngus Goudelock and Courie LLC
270 Peachtree Street NW
Suite 1800
Atlanta, GA 30343

I mailed by United States Postal Service the document to the following non-CM/ECF participants: None

This 20th day of February, 2023.

/s/ M. Angela Cooper
M. ANGELA COOPER, ESQ.
For the Firm

ATTACHMENT B

Defendant designates the following expert witnesses who may present evidence at trial under Rule 702, 703 and 705 of the Federal Rules of Evidence:

David J. Gower, M.D., F.A.C.S., Piedmont Neurosurgery, 220 JL White Drive, Suite 150, Jasper, Georgia 30143, (706) 299-2300. Dr. Gower will testify regarding the Plaintiff's medical treatment, history, diagnoses, prognosis, and causation, including, but not limited to, the conditions the Plaintiff claims were caused by the accident. Dr. Gower's opinions are based upon his education, training, and experience, and his review of the materials in this case, including the Plaintiff's medical records as set forth in Dr. Gower's report. Dr. Gower's opinions and basis for those opinions are contained in his report which is incorporated by reference.

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), a copy of Dr. Gower's prepared and signed report covering his opinions and the factual basis of those opinions is attached as Exhibit "1", including a copy of his curriculum vitae, a list of publications, prior expert testimony at trial or by deposition, and statement of compensation.

John E. Kocke, R.N., M.S.N., C.C.M., C.L.C.P., C.M.S.P., CoreCare Management, 631 Riverhighlands Blvd, Suite A,

Covington, Louisiana 70433, (504) 339-3026. Kocke will testify regarding the reasonableness of the medical billing charges for treatment provided to the Plaintiff, and their comparison to usual, customary, and reasonable data and Medicare. Kocke's opinions are based upon his education, training, and experience, and his review of the materials in this case, including Plaintiff's medical records and bills as set forth in Kocke's report. Kocke's opinions and basis for those opinions are contained in his report which is incorporated by reference.

Pursuant to Fed. R. Civ. P. 26(a)(2)(B), a copy of Kocke's report containing his opinions and the factual basis of those opinions is attached hereto as Exhibit "2", including a copy of his curriculum vitae, a list of publications, prior expert testimony at trial or by deposition, and a statement of the compensation.

Matthews W. Gwynn, M.D., Atlanta Neurology PC, 5673 Peachtree-Dunwoody Rd., NE, Suite 300, Atlanta, Georgia, (404)256-3720. Dr. Gwynn will testify regarding the Plaintiff's medical treatment, history, diagnoses, prognosis, and causation, including, but not limited to, the conditions the Plaintiff claims were caused by the accident. Dr. Gwynn's opinions are based upon his education, training, and experience, review of Plaintiff's medical records and his treatment Plaintiff. A copy

of his CV and certified copies of Dr. Gwynn's medical treatment records of Plaintiff are attached and incorporated herein as "Exhibit 3". Dr. Gwynn is expected to testify that the MRI of Plaintiff's brain on November 12, 2021 does not show findings that are related to a head injury, that as of December 13, 2021 Plaintiff was at maximum medical improvement with 0% impairment, that he could return to full time and unrestricted work, and that Plaintiff's complaints of headaches are not related to the accident.